REMARKS/ARGUMENTS

1.) Claim Rejections – 35 U.S.C. § 102(b)

The Examiner rejected claims 1-11 under 35 U.S.C. § 102(b) as being anticipated by Applicant's admitted prior art. Applicant respectfully traverses Examiner's reasoning and conclusion, as the discussion in the "Background if the Invention" does not disclose the present invention. On page 2, lines 2-12, the conventional method of transferring an *entire* voice tag library to a DSP each time voice activation used is disclosed as prior art. When the entire voice tag library is transferred from the device storage to the DSP storage, a large DSP memory is required. Further, as described in the "Background of the Invention" different operating modes can be implemented depending on the use of the device, as seen in Figure 3. However, the "Background of the Invention" section does not disclose the *partial* transfer of the voice tag library to the DSP depending on the operating mode selected as seen in Figure 5 and as described on page 5, line 36 through page 7 lines 10 of the present application. In other words, in the present invention, each operating mode, in addition to setting certain parameters as seen in Figure 5, can have a corresponding number of voice tags that are transferred from the device memory to the DSP memory, the number transferred voice tags being a *subset* of the total number of voice tags that are stored in device memory outside the DSP memory. In a conventional device, such as that described in the "Background of the Invention" section of the present application and in the cited reference Barber (US 6198947) (as discussed in more detail below) *all* of the voice tags are transferred into the DSP memory, regardless of the operating mode that is selected by the user. The present invention is clearly distinguishable from the conventional device disclosed in the "Background of the Invention" and Barber.

2.) Claim Rejections – 35 U.S.C. § 102(e)

The Examiner also rejected claims 1-11 under 35 U.S.C. § 102(e) as being anticipated by Barber. Applicant traverses the Examiner's reasoning and conclusion. Barber discloses an external control unit (ECU) with a reduced keypad that is integrated

in a voice activated vehicular telephone system which includes a voice adapter (VA) providing an interface between the ECU and a portable telephone. The ECU uses a keypad with fewer keys than a conventional portable telephone. The keys on the ECU are chosen for their value as one-touch implementations of many functions which could otherwise require more time-consuming and complicated voice instructions, as well as for their ability to ensure that all call processing functions are provided by the telephone system without access to a complete keypad. The VA is able to provide audible prompts and other status information to the user. The integration of the telephone system in Barber enables the ECU keys to provide a variety of different functions varying with different operational modes of the system (which is contextually different from the operating modes described in the present application), such as, for example, during an idle mode compared to a call-in-process mode. The use of a voice activated dialer (VAD) key during the idle mode in Barber causes the vehicular telephone system to prompt the user to speak a number to be dialed. The use of a directory (DIR) key during the idle mode results in a prompt for the user to speak a name previously stored in the directory for quickly dialing an accompanying stored telephone number. *All* of the digital voice tags used in Barber to effectuate this functionality presumably loaded into the DSP memory, which is cited as a disadvantage which is overcome by the present invention.

Barber does not disclose the present invention as seen in Figures 4 and 5. Specifically, Barber does not disclose the different operating modes including a number of voice tags transferred into a DSP memory from a device memory, said voice tags being a *subset* of the total number of voice tags stored in the device memory.

Specifically, col. 9, lines 25-52 do not disclose "an associated library of stored voice tags for use by the voice detection sub-module when the operating mode is concerned." Rather, Barber only discloses voice tags (e.g., HOME, OFFICE, MOM), which presumably are all loaded into DSP memory from the device memory, regardless of the operating mode concerned. Further, it appears that the Examiner is equating HOME, OFFICE, MOM, with operating modes, whereas in the present invention, the operating modes are certain operational characteristics of the phone (volume, ringer level, light, etc.) which are different based on the mode selected and the voice tags are

the voice recognition data files mapped to different telephone numbers. In Barber, HOME, OFFICE, MOM, etc. actually refer to voice recognition data files mapped to different telephone numbers, and are not operating modes as stated by the Examiner on page 10, paragraph 2 of the Office Action. As seen in Figure 5 of the present invention, only a certain subset of voice tags are loaded into the DSP memory depending on the operating mode selected. This is a significant difference from the device disclosed in Barber. Therefore, the allowance of claims 1-11 is respectfully requested.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims 1-11 currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

/Michael Cameron, #50,298/

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Michael Cameron
Registration No. 50,298

Ericsson Inc.
6300 Legacy Drive, M/S EVR 1-C-11
Plano, Texas 75024

(972) 583-4145
michael.cameron@ericsson.com